

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-11417-RCL

CHRISTOPHER C. BITTNER and CAROL
BITTNER,

Plaintiffs

v.

FRANK WILLIAMS, THEODORE A.
SAULNIER, In His Capacity as CHIEF OF
THE TISBURY POLICE DEPARTMENT, and
THE TOWN OF TISBURY,

Defendants

DEFENDANT FRANK WILLIAMS,
THEODORE A. SAULNIER, AND
TOWN OF TISBURY'S REQUEST
FOR VOIR DIRE OF THE JURY

Now come defendants Town of Tisbury, Chief Theodore A. Saulnier, and Frank Williams and hereby respectfully proposes the following voir dire questions for submission to the jury:

1. Does any member of the jury panel know any of the parties or witnesses in this case?
2. Has any member of the jury panel ever been arrested by a law enforcement official?
3. Does any member of the jury panel have an immediate relative who has ever been arrested by a law enforcement official?
4. Has any member of the jury panel ever had dealings of any nature with a law enforcement official in which he or she felt that the law enforcement official acted in a hostile, overly aggressive or otherwise inappropriate manner?
5. Has any member of the jury panel ever sued a law enforcement official or municipality?

6. Has any member of the jury panel ever been a witness in a lawsuit against a law enforcement official or municipality?
7. Does any member of the jury hold employment as a mental health professional?
8. Has any member of the jury earned a degree, certification or other qualification to provide counseling or mental health care?

DEFENDANTS,

By their attorneys,

/s/Katharine Goree Doyle
Joseph L. Tehan, Jr. (BBO #494020)
Katharine Goree Doyle (BBO#634131)
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